

**REMARKS/ARGUMENTS**

Prior to the entry of this Amendment, claims 1, 3-14, 16, 18-25, 27, 29-36 and 38-52 were pending in this application. Claims 1, 7-14, 16, 20-25, 27, 31-36, 38, 41-43, 46-48, 51, and 52 have been amended, claims 3-6, 18, 19, 29, 30, 40, 45, and 50 have been canceled, and claim 53 has been added herein. Therefore, claims 1, 7-14, 16, 20-25, 27, 31-36 and 38, 39, 41-44, 46-49, and 51-53 are now pending in this application. Applicants request reconsideration of these claims for at least the reasons presented below.

**35 U.S.C. § 102 Rejection, Guheen**

Claims 1, 3-14, 16, 18-25, 27, 29-36 and 38-52 were previously rejected under 35 U.S.C. §102(e) as being anticipated by U. S. Patent No. 6,519,571 to Guheen et al. (hereinafter “Guheen”). The Applicants respectfully submit the following arguments pointing out significant differences between claims 1, 3-14, 16, 18-25, 27, 29-36 and 38-52 under 35 submitted by the Applicant and Guheen.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” MPEP 2131 citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicant respectfully argues that Guheen fails to disclose each and every claimed element. For example, Guheen fails to disclose, either expressly or inherently, retrieving a workflow from a set of workflows for responding to a request for a certificate related action, e.g., enrollment, renewal, or revocation. Guheen also fails to disclose wherein the workflow corresponds to the certificate related action and a set of characteristics for a user. Guheen does not disclose one of the workflows requiring approval for a certificate action while another does not. Furthermore, Guheen does not disclose selecting a workflow based on a user type. That is, Guheen does not disclose, expressly or inherently, selecting workflows that handle

certificate related requests differently, i.e., requiring or not requiring approval, based on the type of user requesting the action.

Guheen is directed to "utilizing a user profile to customize an interface." (Col. 1, line 8-9) More specifically, Guheen describes "utilizing various types of user indicia such as search requests, products purchased, products looked at but not purchased, products purchased and returned, reasons for returning products, customers stated profile including income level, education level, stated profession, etc. for the purpose of customizing a user interface." (Col. 2, lines 6-12) However, for at least the reasons stated previously, the Applicants respectfully maintain that Guheen fails to disclose, either expressly or inherently, retrieving a workflow from a set of workflows for responding to a request for a certificate related action, e.g., enrollment, renewal, or revocation. Guheen also fails to disclose wherein the workflow corresponds to the certificate related action and a set of characteristics for a user. Rather, Guheen simply states that a Public Key Infrastructure can be used to provide public key encryption and certificate services and that the certificates issued thereby can be managed. However, Guheen fails to disclose how such management is performed. Thus, Guheen also fails to disclose, expressly or inherently, one workflow of a plurality of workflows for responding to requests for certificate related actions requiring approval for the action while another workflow of the plurality does not does not require approval. Furthermore, Guheen does not disclose selecting between such workflows based on a user type of the user for which the request is made. That is, Guheen does not disclose, expressly or inherently, selecting workflows that handle certificate related requests differently, i.e., requiring or not requiring approval, based on the type of user requesting the action.

Claim 1, upon which claims 2-15 depend, claim 16, upon which claims 17-26 depend, and claim 27, upon which claims 28-37 depend, each recite in part "receiving at an Identity System a request for a first certificate related action for a first user wherein the first certificate related action is selected from a group consisting of a certificate enrollment action, a

certificate renewal action, and a certificate revocation action; and retrieving by the Identity System a first workflow for responding to said request from a plurality of workflows for responding to requests for certificate related actions, wherein each workflow in said plurality of workflows corresponds to a different set of characteristics for a user, wherein the first workflow contains a first set of directives and a second workflow in said plurality of workflows contains a second set of directives, wherein said first set of directives is different from said second set of directives, wherein said first workflow calls for obtaining an approval before performing a certificate related action, wherein said second workflow does not call for obtaining an approval before performing a certificate related action, wherein said first workflow for responding to said request corresponds to said first certificate related action and a set of characteristics for said first user from an identity profile for the first user maintained by the Identity System, the set of characteristics for the first user including a user type for the first user, and wherein retrieving the first workflow further comprises selecting the first workflow from the plurality of workflows based on the first certificate related action and the user type of the first user." Guheen fails to disclose, either expressly or inherently, each of these claimed elements. For example, Guheen fails to disclose retrieving a workflow from a set of workflows for responding to a request for a certificate related action, e.g., enrollment, renewal, or revocation. Guheen also fails to disclose wherein the workflow corresponds to the certificate related action and a set of characteristics for a user. Guheen does not disclose one of the workflows requiring approval for a certificate action while another does not. Furthermore, Guheen does not disclose selecting a workflow based on a user type. That is, Guheen does not disclose, expressly or inherently, selecting workflows that handle certificate related requests differently, i.e., requiring or not requiring approval, based on the type of user requesting the action. Rather, Guheen does not seem to describe certificate management other than to say that certificates can be managed. For at least these reasons, claims 1, 3-14, 16, 18-25, 27, and 29-36 are distinguishable from Guheen and should be allowed.

Claim 38, upon which claims 39-42 depend, claim 43, upon which claims 44-47 depend, and claim 48, upon which claims 49-52 depend, each recite in part "receiving a first

request for a first certificate related action for a first user; retrieving a first workflow for responding to said first request from a ~~set~~ plurality of workflows, wherein said first workflow corresponds to said first certificate related action and a set of characteristics for said first user, wherein each workflow in said plurality of workflows corresponds to a different set of characteristics for a user, wherein said first workflow calls for obtaining an approval before performing a certificate related action, wherein a second workflow of the plurality of workflows does not call for obtaining an approval before performing a certificate related action, and wherein retrieving the first workflow for responding to said first request further comprises selecting the first workflow from the plurality of workflows based on the first certificate related action and a user type of the first user; performing said first workflow, wherein performing said first workflow comprises retrieving an approval response and obtaining a certificate; receiving a second request for a second certificate related action for a second user; retrieving a second workflow for responding to said second request from said plurality of workflows, wherein said second workflow corresponds to said second certificate related action and a user type of said second user; and performing said second workflow, wherein performing said second workflow comprises obtaining a second certificate without retrieving an approval response." Guheen fails to disclose, either expressly or inherently, each of these claimed elements. For example, Guheen fails to disclose retrieving a workflow from a set of workflows for responding to a request for a certificate related action, e.g., enrollment, renewal, or revocation. Guheen also fails to disclose wherein the workflow corresponds to the certificate related action and a set of characteristics for a user. Guheen does not disclose one of the workflows requiring approval for a certificate action while another does not. Furthermore, Guheen does not disclose selecting a workflow based on a user type. That is, Guheen does not disclose, expressly or inherently, selecting workflows that handle certificate related requests differently, i.e., requiring or not requiring approval, based on the type of user requesting the action. Rather, Guheen does not seem to describe certificate management other than to say that certificates can be managed. For at least these reasons, claims 38-52 are distinguishable from Patel and should be allowed.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Dated: June 5, 2008

Respectfully submitted,

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